

## **Declaration of Seth Keshel**

Pursuant to 28 U.S.C Section 1746, I, Seth Keshel, make the following declaration.

1. I am over the age of 21 years and I am under no legal disability, which would prevent me from giving this declaration.
2. I am a trained data analyst with experience in multiple fields, including service in the United States Army as a Captain of Military Intelligence, with a one-year combat tour in Afghanistan. My experience includes political involvement requiring a knowledge of election trends and voting behavior.
3. I reside at 233 Muir Hill Dr., Aledo, TX 76008.
4. My declaration highlights substantial deviance from statistical norms and results regarding voting patterns in Wisconsin.
5. All 2020-related voting totals are taken from the Decision Desk HQ unofficial tracker, are not certified, and are subject to change from the time of the creation of this declaration.
6. Wisconsin has shown a steady decrease for support in Democratic presidential nominees since Barack Obama won the state by 13.91% in 2008. He won Wisconsin again in 2012, but only by a margin of 6.94%, and Republican Donald Trump won the state by 0.77% in 2016.
7. As part of an overall working-class voter shift, Wisconsin has moved in the same manner as Pennsylvania, Ohio, Michigan, and Minnesota – decreasing levels of support for Democratic nominees, and by consequence of this shift, increasing levels of support for Republican

nominees. This shift is captured in visual form in Exhibit A to this declaration.

8. The following counties have cast more Democratic presidential votes than cast for Obama in 2008, when he won the state by 13.91%:

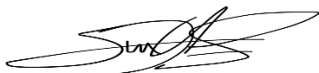
- a. Ozaukee – 26,515 Biden votes, a 31.5% increase from 2016, and 28.8% more than cast for Obama in 2008. President Trump has increased his vote share by 11.3%, receiving 33,912 votes. Democratic vote shifts were -6.9% in 2012 and +5.3% in 2016.
- b. Dane – 260,157 Biden votes, a 19.5% increase from 2016, and 26.3% more than cast for Obama in 2008. President Trump has increased his vote share by 10.5%, receiving 78,789 votes. Democratic vote shifts were +4.9% in 2012 and +0.8% in 2016. Dane County is home to the University of Wisconsin. President Obama had record support, turnout, and enthusiasm among college-age students and did not have to navigate pandemic-related challenges to turn out these voters, which makes Biden's total extremely suspicious.
- c. Waukesha – 103,867 Biden votes, a 31.1% increase from 2016, and 21.7% more than cast for Obama in 2008. President Trump has increased his vote share by 12.0%, receiving 159,633 votes. Democratic vote shifts were -7.7% in 2012 and +0.6% in 2016.
- d. St. Croix - 23,190 Biden votes, a 32.7% increase from 2016, and 9.5% more than cast for Obama in 2008. President Trump has increased his vote share by 22.8%, receiving 32,190 votes. Democratic vote shifts were -6.0% in 2012 and -12.2% in 2016,

making such a sharp Democratic turnabout in the face of a strong President Trump vote increase extremely suspect.

- e. Washington - 26,647 Biden votes, a 27.8% increase from 2016, and 3.6% more than cast for Obama in 2008. President Trump has increased his vote share by 16.4%, receiving 60,235 votes. Democratic vote shifts were -9.9% in 2012 and -10.0% in 2016. A rebound of 27.8% for Democrats from two consecutive cycles of heavy losses, particularly with President Trump reconsolidating the Republican Party base and lost third-party voters, seems unlikely.
  - f. Bayfield - 6,155 Biden votes, a 24.3% increase from 2016, and 3.1% more than cast for Obama in 2008. President Trump has increased his vote share by 12.0%, receiving 4,617 votes. Democratic vote shifts were +1.0% in 2012 and -18.9% in 2016.
9. Milwaukee County's voter rolls shrank from 2016 to 2020, after losing 13.1% of President Obama's Democratic vote total from 2012; however, this year, Milwaukee County has surged in Democratic votes to nearly equal Obama re-election levels with 317,251 votes, even as President Trump has made an increase of 6.6% in votes. With a declining voter roll, Milwaukee County was likely on track to cast less than 275,000 Democratic ballots this year. Combining these resurgent totals with the transparency issues experienced on the early morning hours of November 4, their current total of 317,251 is strikingly suspect.
10. *New York Times* live vote reporting shows a dump of 168,541 votes at 3:42:20 (a.m.) on November 4, 2020. Of those votes, 143,378

(85.07%) went for Biden, and just 25,163 (14.93%) went for Trump. This dump was enough to flip the race with almost no transparency to the viewing public. The live graph showing this vote dump (circled) is attached as Exhibit D to this document.

11. President Trump has vastly increased his vote share in the entirety of Wisconsin, and also in the rural parts of the state, including the counties he flipped from Democratic to Republican in 2016; however, against the trends of the previous election, the Democrats have increased at greater margins than Trump has, thereby erasing margin gain, and allowing for suspicious vote totals in Milwaukee, Dane, Ozaukee, Waukesha, St. Croix, and other counties with strikingly high Democratic vote totals to overwhelm Trump's totals. A county classification of Wisconsin is available in Exhibit B to this declaration, and a full analysis of Wisconsin's voter irregularities is available in Exhibit C.



Seth Keshel

17 Nov. 2020

Aledo, Texas